

Exhibit B
Second Declaration of Leonard Gorman

**Supplemental Declaration of Leonard Gorman
Executive Director, Navajo Nation Human Rights Commission**

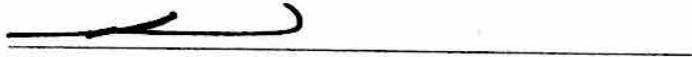
1. I am the Executive Director of the Navajo Nation Human Rights Commission (“NNHRC”).
2. I am hereby supplementing the Declaration I submitted on August 3, 2016.
3. The NNHRC is an office within the Legislative Branch of the Navajo Nation and operates as a clearinghouse to administratively address discriminatory actions against citizens of the Navajo Nation.
4. Because of a history of discrimination and the difficulty of making the trip, many Navajo residents of San Juan County are hesitant to travel to Monticello to vote.
5. The roads to Monticello through the southern parts of San Juan County are in poor condition, making the trip there difficult for me, my staff, and other Navajo. Many of the roads are not paved.
6. On January 5, 2016, my staff and I met with Navajo residents concerned about the mail-only voting system in San Juan County. At that meeting, Ms. Farley, who is in her mid-80s and does not speak English fluently, informed me that in 2014 she received a “letter” in her mail, but that she didn’t know what it was. Time passed, and eventually her son visited and explained that the envelope contained a ballot. This was the first time she realized that she had to vote by mail. Although she was able to cast her ballot, she did not feel like she was fully informed. She doesn’t get her mail regularly as she doesn’t have a car and has to wait for a ride to the Post Office, which is about 17 miles away on a partly dirt road.
7. At the January meeting, Mr. and Ms. Skow, who are also elderly and do not speak English, informed me that in 2014 they received their ballots in the mail, but did not

know what it was. Days later, their kids came home to visit, sorted through their mail for her, and found the ballot. They do not have access to a car, so they have to rely on their children for rides. They do not have a landline, and cell service is poor where they live, so calling the County for assistance with translation would be difficult.

8. Because the County has not properly educated Navajo residents about how to vote, or provided full and accurate translations of all election materials, my office has continued to have to expend resources and time addressing this issue and educating Navajo residents about San Juan County's voting procedures.

I declare under penalty of perjury that the foregoing is true and correct. Executed on

9/16/16


Leonard Gorman